

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

RICHARD W. JOHNSON, JR. and
ALYSE M. JOHNSON

Debtors

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CHAPTER 11

Case No. 21-10054 (AMC)

DEBTORS' PRETRIAL DISCLOSURES FOR HEARING

In compliance with this Court's Order Governing Procedures At Evidentiary Hearing Conducted Remotely By Video Conference (*Dkt. No. 77*), Richard Johnson and Alyse Johnson, the debtors-in-possession ("Debtors"), by and through their counsel, Smith Kane Holman, LLC, make the following Pretrial Disclosures relating to the confirmation hearing on the Debtors' First Amended Plan of Reorganization dated August 16, 2021 (the "Plan"):

Remote Witness List

1. Witness #1
 - a. Name and Title: Richard W. Johnson, debtor-in-possession
 - b. Summary of Anticipated Testimony: Mr. Johnson will testify as to all aspects in contest regarding the Plan, including, without limitation, the feasibility thereof.
 - c. E-mail address: rwjohnsonesq@aol.com
 - d. Location of Witness: Newtown, PA
 - e. Place of Testimony: Home or Office
 - f. Any other person with witness: None
 - g. Access to other documents: None

List of Exhibits

1. Debtors' voluntary petition, bankruptcy schedules and statement of financial affairs (*Dkt. No. 1*)
2. MOR January of 2021 (*Dkt. No. 36*)
3. MOR February of 2021 (*Dkt. No. 39*)
4. MOR March of 2021 (*Dkt. No. 45*)
5. MOR April of 2021 (*Dkt. No. 48*)
6. MOR May of 2021 (*Dkt. No. 57*)
7. MOR June of 2021 (*Dkt. No. 61*)
8. MOR July of 2021 (prepared, to be filed)
9. MOR August of 2021 (prepared, to be filed)
10. MOR September of 2021 (to be filed)
11. MOR October of 2021(to be filed)
12. 2021 YTD receipts (to be provided)
13. 2020 personal tax returns
14. 2019 personal tax returns
15. 2018 personal tax returns
16. Amended Plan (with exhibits, including cash flows) (*Dkt. No. 70*)
17. PA Dept. of Revenue Proof of Claim
18. IRS Proof of Claim
19. Debtors reserve the right to include any other documents filed of record in their chapter 11 case, including any other proofs of claim

20. Any other exhibits identified by any other parties

SMITH KANE HOLMAN, LLC

Dated: September 27, 2021

By: /s/ David B. Smith
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